



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



494958

REPLY TO THE ATTENTION OF

**MEMORANDUM**

**SUBJECT:** Request for Approval and Funding for a Time-Critical Removal Action at the Harper Industries Site, Cleveland, Cuyahoga County, Ohio (Site ID #C5AK)

**FROM:** James E. Augustyn, On-Scene Coordinator  
Response Section 1

**THRU:** Jason H. El-Zein, Chief  
Emergency Response Branch 1

**TO:** Richard C. Karl, Director  
Superfund Division

**I. PURPOSE**

The purpose of this Action Memorandum is to request and document your approval to expend up to \$680,819 to conduct a time-critical removal action to abate an imminent and substantial threat to public health, welfare, and the environment posed by the Harper Industries Site (the Site) located at 10101 Woodland Avenue, Cleveland, Cuyahoga County, Ohio 44104.

The proposed time-critical removal actions in this memorandum are necessary to mitigate threats to public health, welfare, and the environment posed by the release or threat of release of asbestos-containing building debris at the Site.

This removal action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1), and 40 C.F.R. § 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.415, to abate or eliminate the immediate threats posed to public health and/or the environment.

The uncontrolled conditions of the hazardous substances present at the Site require that this action be classified as a time-critical removal action. The project will require approximately 30 working days to complete.

Removals involving asbestos, when it is the principal contaminant of concern, have been designated as nationally significant. The Region has secured Headquarters concurrence in accordance with the September 2009 Action Memorandum guidance.

## II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: OHN000506130  
RCRA ID: NA  
State ID: NA  
Category: Time-Critical Removal Action

### A. Site Description

The Harper Industries Site is an abandoned manufacturing property located at 10101 Woodland Avenue, Cleveland, Cuyahoga County, Ohio. The Site was historically used as a manufacturing and office building. Five out of six buildings were demolished by the property owner to salvage scrap metal. The property is vacant and open to trespass. (Administrative Record Index #2) (ARI #2)

Asbestos was not properly abated from the five buildings prior to demolition and it is present in the remaining demolition debris at the Site. Cleveland Division of Air Quality (CDAQ) and the Ohio EPA initiated enforcement actions against Harper Industries Inc. (Harper) to compel the company to properly abate the property. (ARI #2) Harper failed to comply with all Notices and Orders and filed for dissolution of the company in February 2013. (ARI #1)

On November 12, 2015, the Ohio EPA referred the Site to EPA to conduct a removal action to abate environmental and human health threats resulting from abandoned hazardous substances on the property. (ARI #1)

#### 1. Removal site evaluation

The City of Cleveland, Department of Building and Housing, condemned the buildings in 2009. In November 2009, Harper Industries Inc. (Harper), the owner of the property, hired an environmental consulting firm to conduct an asbestos survey of all buildings on the property. The survey documented all areas on the property that contained regulated asbestos-containing material (RACM). (ARI #2)

On December 9, 2009, Harper submitted notification of demolition to CDAQ. The notification specified RACM removal by a licensed asbestos abatement contractor occurred at the property. (ARI #2)

On January 27, 2010, CDAQ inspected the property and determined that Harper demolished five of the buildings without properly removing all RACM from the buildings prior to demolition and that some RACM had been abated without employing proper emission controls. (ARI #2)

On February 3, 2010, CDAQ submitted for analysis a total of 5 samples of various suspect asbestos containing materials (ACM) collected from debris piles. Of the samples, 3 out of the 5 contained 3 to 20 percent chrysotile asbestos. (AR #2)

On March 12, 2010, June 24, 2010, and March 15, 2011, CDAQ issued notice of violation (NOV) letters to Harper. The NOV's cited Harper for failing to remove friable asbestos-containing materials prior to demolition of buildings, failing to adequately wet RACM during removal operations, and for failing to keep the asbestos-containing materials wet at all times during and after demolition. (ARI #2)

From March 2010 through April 2011, CDAQ attempted to compel Harper to take corrective actions at the Site. CDAQ personnel conducted numerous Site visits over this time period and observed additional violations by Harper. (ARI #2) CDAQ referred the case to Ohio EPA for enforcement on April 26, 2011. (ARI #1 & #2)

In February 2013, James H. Hyland III, President of Harper Industries, Inc. filed for dissolution of the company. (ARI #1)

On May 5, 2014, Ohio EPA issued Director's Unilateral Final Findings and Orders (Order) requiring Harper to secure the property, remove the regulated asbestos-containing debris from the property and dispose of it at a properly licensed landfill. Harper failed to comply with the Order. (ARI #3)

Ohio EPA referred the case to Ohio Attorney General's Office on December 30, 2014. A default Judgment against Harper was entered on August 17, 2015. (ARI #4)

The main concern is that the ACM is friable or potentially friable and asbestos fibers are being released into the air and possibly migrating off site. Friable asbestos is a listed hazardous substance in 40 C.F.R. Part 302, Table 302.4. Another concern is that trespassers on the Site (as evidenced by graffiti) will come into contact with the ACM, disturb the materials, and cause releases into the air. Trespassers could illegally remove scrap steel contaminated with asbestos fibers to sell to scrap dealers in the area.

## **2. Physical location**

The Site is located at 10101 Woodland Avenue in Cleveland, Cuyahoga County, Ohio. The geographic coordinates of the Site are 41°29'20.09" north latitude and 81°36'59.49" west longitude.

An Environmental Justice (EJ) analysis for the Site is contained in Attachment II. Screening of the surrounding area used Region 5's EJ Screen Tool. Region 5 has reviewed environmental and demographic data for the area surrounding the Site at 10101 Woodland Avenue, Cleveland, Cuyahoga County, Ohio, and determined there is a high potential for EJ concerns at this location.

## **3. Site characteristics**

The Site is located in a mixed commercial and residential area and is bordered to the north and west by railroad tracks and a commercial property; to the east by a vacant lot and Woodhill

Road; and to the south by Woodland Avenue and residential properties. The Site originally consisted of 6 buildings in the complex. Of the 6 buildings, 5 were demolished by Harper without abating the known asbestos materials in the buildings or improperly removing some of the asbestos. A single 5-story building remains on the Site which is surrounded on 2 sides by asbestos-containing demolition debris piles.

The Site is abandoned and the owner provides no physical presence on the property. The fencing around the Site is breached at numerous locations, thus allowing for easy access by trespassers.

Property ownership has reverted to the State of Ohio due to failure of the owner to pay property taxes. The Cuyahoga County Fiscal Officer, as Agent for the State of Ohio, per O.R.C. 5721.09 has granted written access to EPA to conduct removal actions on the Site.

#### **4. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant**

Friable asbestos is a listed hazardous substance under 40 C.F.R. § 302.4. Cleveland Division of Air Quality (CDAQ) testing has documented friable asbestos mixed within the debris piles of the Site. (ARI # 1, #2, & #3) Friable asbestos present in the waste piles continues to degrade and release with the potential for off-Site airborne migration via wind action. The Site is open to foot traffic and the ACM in the debris piles could easily be disturbed by trespassers and cause releases of ACM into the air.

A release or threat of release of hazardous substances, pollutants, or contaminants is present at the Site.

#### **5. NPL status**

The Site is not on the NPL and has not been proposed for listing on the NPL. The Site has not received a Hazard Ranking Score and is not being referred to the NPL Site Assessment program.

#### **6. Maps, pictures and other graphic representations**

Attachment III Site Location Map

Attachment IV Photo Log

#### **B. Other Actions to Date**

##### **1. Previous actions**

This Action Memorandum documents previous response and investigatory actions in the background section (Section II.A.1).

## 2. Current actions

The Site is not secure and there are no activities being conducted at the Site.

### C. State and Local Authorities' Roles

#### 1. State and local actions to date

CDAQ collected bulk asbestos samples on January 28, 2010, documenting the presence of asbestos in the debris piles. CDAQ directed the property owner to submit a corrective action plan to address the asbestos abatement activities on Site. On March 1, 2010, Harper submitted an Asbestos Hazard Abatement Project Agreement and Scope of Work outlining planned corrective actions for the Site. From March 2010 through April 2011, CDAQ attempted to compel Harper to take corrective actions at the Site. CDAQ personnel conducted numerous Site visits over this time period and observed additional NESHAP violations by Harper. Two subsequent NOV's were issued by CDAQ to Harper for failure to meet the commitments made in their corrective action plan. (ARI #2)

#### 2. Potential for continued State/local response

The Ohio EPA has indicated that it does not have the resources to address the ACM at the Site. Due to the continued non-action of the property owner, the Ohio EPA has requested EPA assistance. (ARI #1)

### III. **THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

The conditions at the Site present an imminent and substantial threat to the public health, or welfare, and the environment and meet the criteria for a time-critical removal action set forth in 40 CFR § 300.415(b)(2) of the NCP. These criteria include, but are not limited to, the following:

#### **Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants, § 300.415 (b)(2)(i);**

CDAQ sampling results from the Site indicate that asbestos is present within the on-site debris piles. The (ACM) was damaged during demolition activities. Since these materials have been abandoned on Site in an uncontrolled manner, in outdoor debris piles, they present a potential threat to the public health, or welfare of the United States or the environment. The ACM material will continue to release asbestos into the environment through transport and deterioration due to weather conditions and/or trespassing activities.

Asbestos is a hazardous substance as defined by 40 CFR Section 302.4 of the NCP. Asbestos is of potential concern because chronic inhalation exposure to excessive levels of asbestos fibers suspended in air can result in lung diseases such as asbestosis, mesothelioma, and lung cancer.

EPA has determined that asbestos is a human carcinogen (ATSDR, CAS # 1332-21-4, September 2001) (ARI #6). Sub-acute exposures as short as a few days have been shown to cause mesothelioma. Asbestos mainly affects the lungs and the membrane that surrounds the lungs. Breathing high levels of asbestos fibers for long periods of time may result in scar-like tissue in the lungs and in the pleural membrane (lining) that surrounds the lung. This disease is called asbestosis and is usually found in workers exposed to asbestos but not in the general public. People with asbestosis have difficulty breathing, often a persistent cough, and in severe cases heart enlargement. Asbestosis is a serious disease and can eventually lead to disability and death. (ARI #6)

There are no signs or other deterrents to warn the public of the potential asbestos hazard at the Site. Site access is unrestricted and trespassers entering the Site could be exposed to airborne asbestos fibers or come in direct contact with damaged ACM. During the Site visit the OSC observed signs of graffiti at the Site. Trespassers could cause an accidental or intentional release of hazardous materials at the Site.

**Weather conditions that may cause hazardous substances or pollutants and contaminants to migrate or be released, § 300.415(b)(2)(v);**

Weather conditions could contribute to deterioration and potential subsequent release of asbestos fibers into the environment. Based on the damaged condition and presence of ACM within the debris piles, the debris at the Site may present a threat to the public health or welfare of the United States or the environment through migration as windblown particles or suspended in rainwater runoff.

**The availability of other appropriate federal or State response mechanisms to respond to the release, § 300.415(b)(2)(vii);**

The Ohio EPA referred the Site to EPA Region 5 requesting assistance in performing a removal action for Site-related threats to the public health, or welfare, or the environment. (ARI #1)

**IV. ENDANGERMENT DETERMINATION**

Given the Site conditions, the nature of the known and suspected hazardous substances on Site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

## V. PROPOSED ACTIONS AND ESTIMATED COSTS

### A. Proposed Actions

#### 1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances on Site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment.

Proposed removal activities will include:

- a. Develop and implement a Site Health and Safety Plan (HASP) and an Air Monitoring Plan;
- b. Repair perimeter fencing and secure entry points to existing building to prevent unauthorized entry to the property;
- c. Dispose all asbestos waste in accordance with U.S. EPA's Off-Site Rule. All hazardous substances and/or pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal will be treated, stored, or disposed of at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 C.F.R. § 300.440;
- d. Take any necessary response actions to address any release or threatened release of a hazardous substance, pollutant, or contaminant that the EPA determines may pose an imminent and substantial endangerment to the public health or the environment.

Portions of remaining building structures determined to be unsafe may need to be demolished to ensure a safe working environment on Site. This refers to standing, unbraced walls that have not been demolished.

This removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site Control consistent with the provisions of 40 C.F.R. 300.415(1). Control of the property will revert to Cuyahoga County as custodian for the State of Ohio.

The estimated costs to complete the activities outlined above are summarized below. These activities will require an estimated 30 on-site working days to complete. Detailed cleanup contractor costs are presented in Attachment V.

#### 2. Contribution to remedial performance

The proposed removal actions will not impede future actions based on available information. No long-term remedial actions are anticipated for the Site. The threats posed by the known asbestos

debris meet the criteria listed in section 300.415(b)(2) of the NCP and the response actions proposed are consistent with any potential remedial actions which may be required. However, elimination of hazardous substances, pollutants and contaminants that pose a substantial threat of release is likely to reduce the need for any long-term remedial actions.

**3. Engineering Evaluation/Cost Analysis (EE/CA)**

Not Applicable

**4. Applicable or relevant and appropriate requirements (ARARs)**

EPA will comply with all applicable, relevant, and appropriate requirements (ARARs) of Federal and State law to the extent practicable considering the exigencies of the circumstances.

**Federal**

National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61, Subpart M § 61.150.

**State**

The OSCs sent an email on March 15, 2016, to Timothy Christman at the Ohio EPA requesting the identification of any applicable state ARARs. (ARI #5) To date, Ohio EPA has not responded to EPA’s request.

**5. Project schedule**

The removal activities are expected to take 30 on-site working days to complete.

**B. Estimated Costs**

The detailed cleanup contractor cost is presented in Attachment V and the Independent Government Cost Estimate is presented in Attachment VI. Estimated project costs are summarized below:

| REMOVAL ACTION PROJECT CEILING ESTIMATE   |            |
|---|------------|
| <b><u>Extramural Costs:</u></b>   |            |
| <u>Regional Removal Allowance Costs:</u>  |            |
| Total Cleanup Contractor Costs<br>(This cost category includes estimates for ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Include a 20% contingency) | \$ 529,949 |
| <u>Other Extramural Costs Not Funded from the Regional Allowance:</u>   |            |

|   |                   |
|---|-------------------|
| Total START, including multiplier costs   | \$ 37,400         |
| Total Decontamination, Analytical & Tech. Services (DATS)                                       | \$ 0              |
| Total CLP   | \$ 0              |
| Subtotal  | \$ 37,400         |
| Subtotal Extramural Costs   | \$ 567,349        |
| Extramural Costs Contingency<br>(20% of Subtotal, Extramural Costs rounded to nearest thousand) | \$ 113,470        |
| <b>TOTAL REMOVAL ACTION PROJECT CEILING</b>   | <b>\$ 680,819</b> |

The response actions described in this memorandum directly address the actual or threatened release of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

#### **VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

Given the Site conditions, the nature of the hazardous substances and pollutants or contaminants documented on Site, and the potential exposure pathways to nearby populations described in Section II, III, and IV above, actual or threatened releases of hazardous substances and pollutants or contaminants from this Site, if not addressed by implementing or delaying the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment, increasing the potential that hazardous substances will be released, thereby threatening the adjacent population and the environment.

#### **VII. OUTSTANDING POLICY ISSUES**

Using the Framework for Investigating Asbestos-Contaminated Sites, OSWER Directive #9200.0-68 (September 2008) EPA implemented the following step-by-step approach to investigate and characterize the potential for human exposure from asbestos contamination at the Site.

Step 1 – Review historical and current data – EPA reviewed Site records where ACM was previously identified by the CDAQ sampling investigations.

Step 2 – Has there been (or is there a threat of) a release to the environment? – EPA has confirmed the site conditions as documented by CDAQ and Ohio EPA and determined a threat of release of ACM to the environment is present at the Site. According to the

Framework if a building has been demolished and asbestos-containing debris is found to remain at the site, this should be considered a release of potential concern to Superfund.

Step 3—Is human exposure likely under current or future site conditions?

Recommended Step 3 is intended to help evaluate whether a complete human exposure pathway exists at or near the site under current or reasonably anticipated future site conditions. If it has been determined that a complete exposure pathway to contaminated outdoor soil exists under current conditions, or may reasonably be expected to occur in the future, it may be appropriate either to undertake a response action or to proceed with further investigation of potential exposures at the site.

Due to the unsecured condition of the Site, and the current danger of trespass by vandals, as evidenced by graffiti at the Site, human exposure is likely under current or future Site conditions.

Based on the factors outlined above, the OSC recommends that a removal be performed to mitigate asbestos exposure at the Site.

The removal involves a nationally significant and precedent-setting issue because the primary driving contaminant addressed by the removal is asbestos. In accordance with redelegation R-14-2, a request for concurrence on actions proposed in the memorandum was sought and obtained from the EPA Office of Emergency Management (OEM).

### **VIII. ENFORCEMENT**

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Confidential Enforcement Addendum.

The total EPA costs of this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$1,259,713.<sup>1</sup>

$$(\$680,819 + \$30,000) + (77.22\% \times \$710,819) = \$1,259,713$$

### **IX. RECOMMENDATION**

This decision document represents the selected removal action for the Harper Industries Site, located in Cleveland, Cuyahoga County, Ohio, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative

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<sup>1</sup> Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of Site -specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

Record (Attachment I) for the Site. Conditions at the Site meet the NCP Section 300.415(b) criteria for a removal, and I recommend your approval of the proposed removal action.

The total removal action project ceiling, if approved, will be \$680,819. Of this, as much as \$643,419 may come from the Regional removal allowance.

APPROVE:  DATE: 6/30/2016  
Director, Superfund Division

DISAPPROVE: \_\_\_\_\_ DATE: \_\_\_\_\_  
Director, Superfund Division

#### Enforcement Addendum

#### Attachments

- I. Administrative Record Index
- II. EJ Analysis
- III. Site Location Map
- IV. Site Photo Log
- V. Detailed Cleanup Contractor Cost Estimate
- VI. Independent Government Cost Estimate

cc: B. Schleiger, U.S. EPA, 5104A, (email: Brian.Schleiger@USEPA.US)  
Craig Butler, Director, Ohio EPA **w/o Enf. Addendum**  
(Email: craig.butler@epa.state.oh.us)  
Mike DeWine, Ohio Attorney General **w/o Enf. Addendum**  
(Email: Mike.DeWine@ohioattorneygeneral.gov)

**BCC PAGE HAS BEEN REDACTED**

**NOT RELEVANT TO SELECTION  
OF REMOVAL ACTION**

**ENFORCEMENT ADDENDUM**

**HAS BEEN REDACTED – THREE PAGES**

**ENFORCEMENT CONFIDENTIAL**

**NOT SUBJECT TO DISCOVERY**

**FOIA EXEMPT**

**NOT RELEVANT TO SELECTION**

**OF REMOVAL ACTION**

# ATTACHMENT I

## U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

### ADMINISTRATIVE RECORD FOR HARPER INDUSTRIES SITE CLEVELAND, CUYAHOGA COUNTY, OHIO

ORIGINAL  
April 2016

| <u>NO.</u> | <u>DATE</u> | <u>AUTHOR</u>             | <u>RECIPIENT</u>           | <u>TITLE/DESCRIPTION</u>   | <u>PAGES</u> |
|------------|-------------|---------------------------|----------------------------|--|--------------|
| 1          | 11/12/15    | Kavalec, J.,<br>Ohio EPA  | Durno, M.,<br>U.S. EPA     | Letter re: Ohio EPA Request for Assistance at the Harper Industries Site   | 6            |
| 2          | 08/12/10    | Samec, M.,<br>CDAQ        | Kavalec, J.,<br>Ohio EPA   | Asbestos Demolition/Renovation Enforcement Action Request  | 142          |
| 3          | 05/05/14    | Weinberg, B.,<br>Ohio EPA | Hyland, J.,<br>Harper Ind. | Director's Unilateral Final Findings and Orders for violations of OAC Chapter 3745-20 at the former Victoreen Building Complex (10101 Woodland Avenue) Cleveland, Ohio (Cuyahoga County) | 8            |
| 4          | 12/03/14    | Butler, C.,<br>Ohio EPA   | DeWine, M.,<br>Ohio AG     | Referral of James H. Hyland III and Harper Industries Inc.   | 5            |
| 5          | 03/15/16    | Augustyn, J.,<br>U.S. EPA | Christman, T.,<br>Ohio EPA | E-Mail Transmission re: Request for Ohio ARARs for the Harper Industries   | 1            |
| 6          | 09/00/01    | ATSDR                     | Public                     | ATSDR ToxFAQs for Asbestos Action Memorandum re: Request for a Time-Critical Removal   | 2            |
| 7          | 00/00/00    | Augustyn, J.,<br>U.S. EPA | Karl, R.,<br>U.S. EPA      | Action at the Harper Industries Site (PENDING)   |              |

**ATTACHMENT II**

**EJ Analysis**

**HARPER INDUSTRIES SITE  
CLEVELAND, CUYAHOGA COUNTY, OHIO**

**MAY 2016**

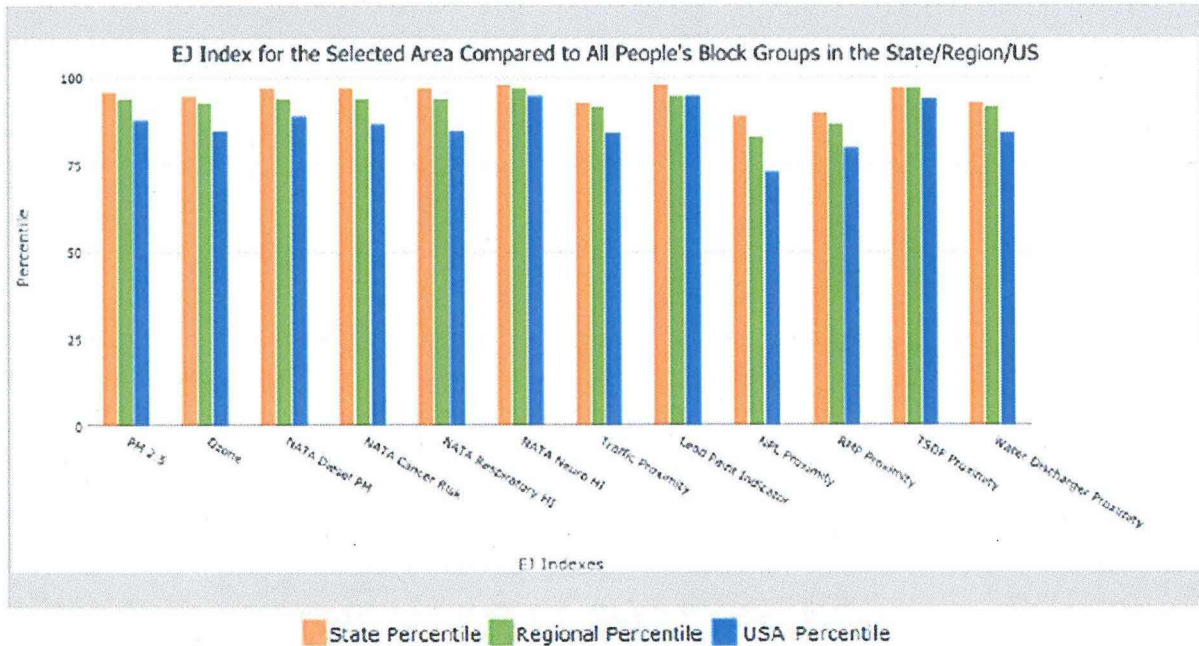


for 1 mile Ring Centered at 41.488318,-81.616541, OHIO, EPA Region 5

Approximate Population: 15801

Harper Industries

| Selected Variables                                 | State Percentile | EPA Region Percentile | USA Percentile |
|--|------------------|-----------------------|----------------|
| <b>EJ Indexes</b>                                  |                  |                       |                |
| EJ Index for PM2.5                                 | 96               | 94                    | 88             |
| EJ Index for Ozone                                 | 95               | 93                    | 85             |
| EJ Index for NATA Diesel PM                        | 97               | 94                    | 89             |
| EJ Index for NATA Air Toxics Cancer Risk           | 97               | 94                    | 87             |
| EJ Index for NATA Respiratory Hazard Index         | 97               | 94                    | 85             |
| EJ Index for NATA Neurological Hazard Index        | 98               | 97                    | 95             |
| EJ Index for Traffic Proximity and Volume          | 93               | 92                    | 84             |
| EJ Index for Lead Paint Indicator                  | 98               | 95                    | 95             |
| EJ Index for Proximity to NPL sites                | 89               | 83                    | 73             |
| EJ Index for Proximity to RMP sites                | 90               | 87                    | 80             |
| EJ Index for Proximity to TSDFs                    | 97               | 97                    | 94             |
| EJ Index for Proximity to Major Direct Dischargers | 93               | 92                    | 84             |



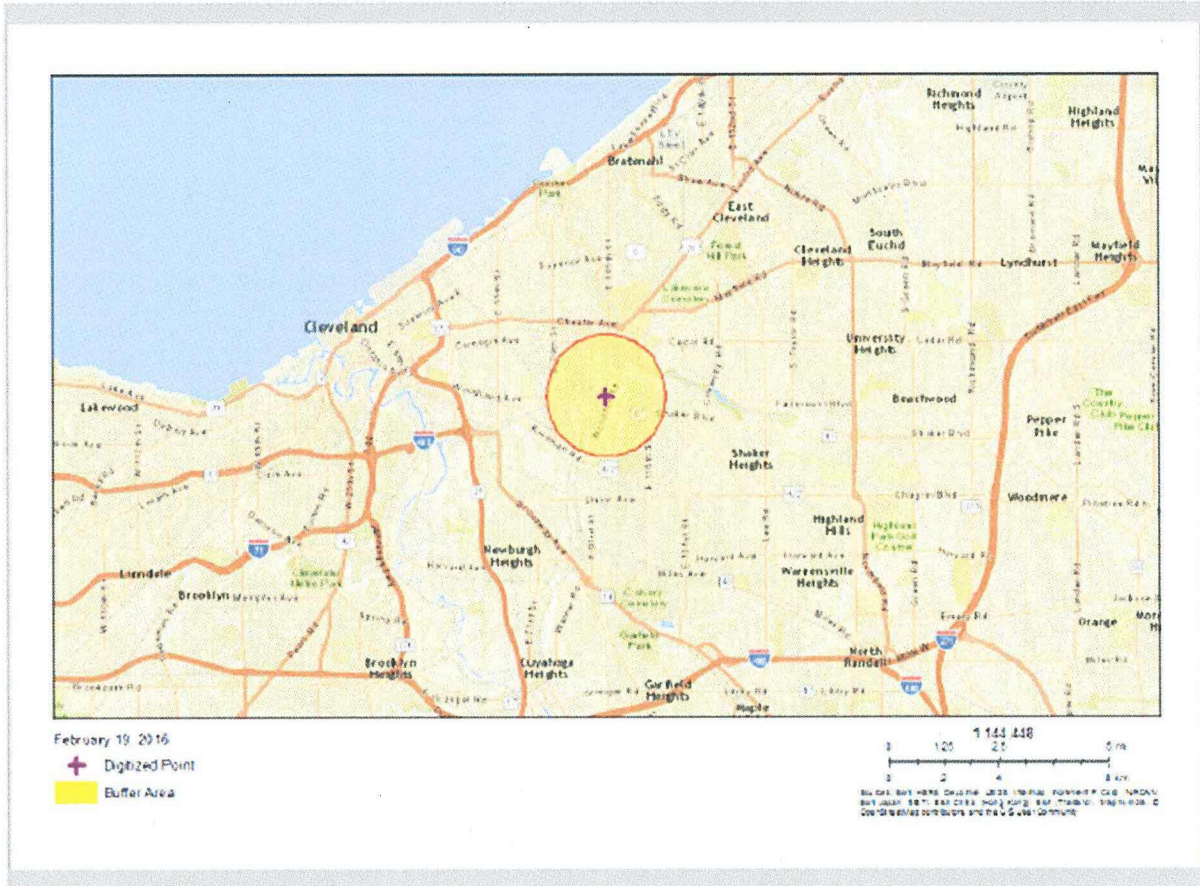
This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.



for 1 mile Ring Centered at 41.488318,-81.616541, OHIO, EPA Region 5

Approximate Population: 15801

Harper Industries





## EJSCREEN Report



for 1 mile Ring Centered at 41.488318,-81.616541, OHIO, EPA Region 5

Approximate Population: 15801

Harper Industries

| Selected Variables  | Raw Data | State Avg. | %ile in State | EPA Region Avg. | %ile in EPA Region | USA Avg. | %ile in USA |
|---|----------|------------|---------------|-----------------|--------------------|----------|-------------|
| <b>Environmental Indicators</b>                                     |          |            |               |                 |                    |          |             |
| Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )            | 12.2     | 11.8       | 82            | 10.8            | 88                 | 9.78     | 94          |
| Ozone (ppb)   | 43.9     | 47.4       | 12            | 44.4            | 47                 | 46.1     | 35          |
| NATA Diesel PM ( $\mu\text{g}/\text{m}^3$ ) <sup>*</sup>            | 1.51     | 0.609      | 94            | 0.712           | 80-90th            | 0.824    | 80-90th     |
| NATA Cancer Risk (lifetime risk per million) <sup>*</sup>           | 64       | 41         | 98            | 42              | 90-95th            | 49       | 80-90th     |
| NATA Respiratory Hazard Index <sup>*</sup>                          | 2.6      | 1.4        | 95            | 1.5             | 80-90th            | 2.3      | 60-70th     |
| NATA Neurological Hazard Index <sup>*</sup>                         | 0.15     | 0.079      | 96            | 0.067           | 95-100th           | 0.083    | 95-100th    |
| Traffic Proximity and Volume (daily traffic count/distance to road) | 97       | 74         | 80            | 69              | 81                 | 110      | 73          |
| Lead Paint Indicator (% Pre-1960 Housing)                           | 0.76     | 0.43       | 82            | 0.4             | 83                 | 0.3      | 89          |
| NPL Proximity (site count/km distance)                              | 0.018    | 0.089      | 22            | 0.086           | 14                 | 0.096    | 20          |
| RMP Proximity (facility count/km distance)                          | 0.15     | 0.3        | 50            | 0.33            | 47                 | 0.31     | 52          |
| TSDF Proximity (facility count/km distance)                         | 0.13     | 0.056      | 92            | 0.051           | 92                 | 0.054    | 91          |
| Water Discharger Proximity (facility count/km distance)             | 0.16     | 0.23       | 55            | 0.23            | 59                 | 0.25     | 59          |
| <b>Demographic Indicators</b>                                       |          |            |               |                 |                    |          |             |
| Demographic Index   | 82%      | 26%        | 98            | 28%             | 97                 | 35%      | 95          |
| Minority Population   | 94%      | 19%        | 97            | 24%             | 95                 | 36%      | 93          |
| Low Income Population   | 69%      | 34%        | 92            | 32%             | 93                 | 34%      | 92          |
| Linguistically Isolated Population                                  | 0%       | 1%         | 69            | 2%              | 59                 | 5%       | 45          |
| Population With Less Than High School Education                     | 29%      | 12%        | 93            | 12%             | 93                 | 14%      | 86          |
| Population Under 5 years of age                                     | 9%       | 6%         | 77            | 6%              | 76                 | 7%       | 74          |
| Population over 64 years of age                                     | 16%      | 14%        | 62            | 13%             | 66                 | 13%      | 69          |

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <http://www.epa.gov/ttn/atw/natamain/index.html>.

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

February 19, 2016

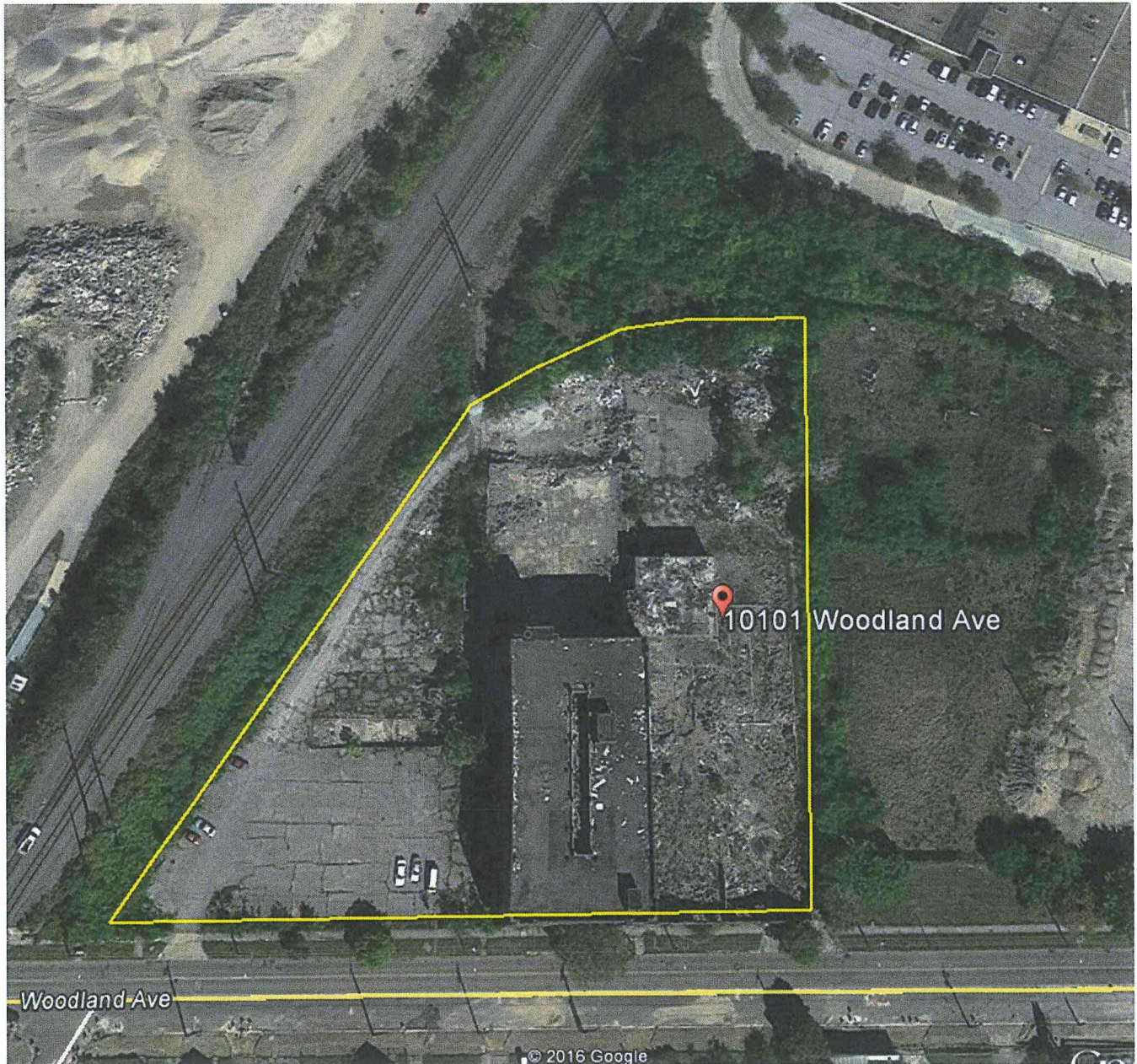
3/3

ATTACHMENT III

SITE LOCATION MAP

HARPER INDUSTRIES SITE  
CLEVELAND, CUYAHOGA COUNTY, OHIO

MAY 2016



**ATTACHMENT IV**

**PHOTO LOG**

**HARPER INDUSTRIES SITE  
CLEVELAND, CUYAHOGA COUNTY, OHIO**

**MAY 2016**



**Site:** Harper Industries Site

**Photograph No.:** 1

**Direction:** Unknown

**Subject:** General demolition debris on site.

**Date:** 10/27/2010

**Photographer:** City Cleveland



**Site:** Harper Industries Site  
**Photograph No.:** 2  
**Direction:** Unknown  
**Subject:** General demolition debris on site.

**Date:** 10/27/2010  
**Photographer:** City Cleveland



**Site:** Harper Industries Site  
**Photograph No.:** 3  
**Direction:** Unknown  
**Subject:** Thermal System Insulation in debris pile

**Date:** 12/2010  
**Photographer:** City Cleveland



**Site:** Harper Industries Site

**Photograph No.:** 4

**Direction:** Unknown

**Subject:** Asbestos transite panel in debris pile.

**Date:** 12/2010

**Photographer:** City Cleveland



**Site:** Harper Industries Site

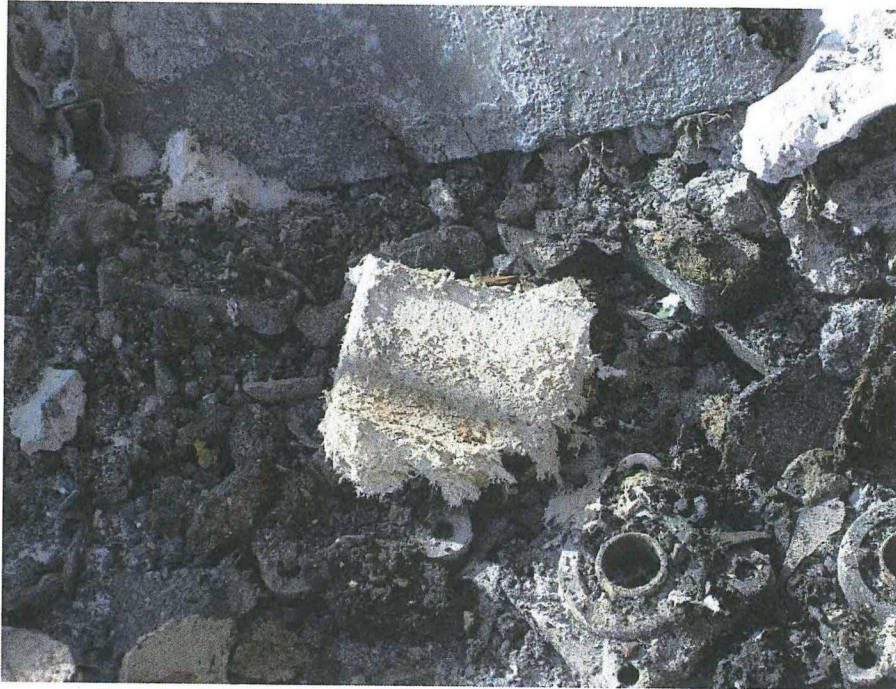
**Photograph No.:** 5

**Direction:** Unknown

**Subject:** Asbestos transite panel in debris pile

**Date:** 12/2010

**Photographer:** City Cleveland



**Site:** Harper Industries Site

**Photograph No.:** 6

**Direction:** Unknown

**Subject:** Asbestos thermal insulation in debris pile

**Date:** 12/2010

**Photographer:** City Cleveland



**Site:** Harper Industries Site

**Photograph No.:** 7

**Direction:** Unknown

**Subject:** Graffiti on Site

**Date:** 06/2014

**Photographer:** City Cleveland



**Site:** Harper Industries Site  
**Photograph No.:** 8  
**Direction:** Unknown  
**Subject:** Graffiti on Site

**Date:** 06/2014  
**Photographer:** City Cleveland

**ATTACHMENT V**

**DETAILED CLEANUP CONTRACTOR ESTIMATE**

**HAS BEEN REDACTED – ONE PAGE**

**NOT RELEVANT TO SELECTION**

**OF REMOVAL ACTION**

**ATTACHMENT VI**

**INDEPENDENT GOVERNMENT COST ESTIMATE**

**HAS BEEN REDACTED – TWO PAGES**

**NOT RELEVANT TO SELECTION**

**OF REMOVAL ACTION**